

Arthur N. Chagaris, Esq.
John J. Lamb, Esq.
Martin R. Kafafian, Esq.
BEATTIE PADOVANO, LLC
50 Chestnut Ridge Road
P.O. Box 244
Montvale, New Jersey 07645-0244
(201) 573-1810
Attorneys for Defendant
Ramapo Hunt & Polo Club Association, Inc.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

RAMAPOUGH MOUNTAIN INDIANS
INC., and RAMAPOUGH LENAPE
NATION,

Plaintiffs,

v.

TOWNSHIP OF MAHWAH, RAMAPO
HUNT & POLO CLUB ASSOCIATION,
INC., GERALDINE ENTRUP, THOMAS
MULVEY, JOHN and JANE DOES 1
THROUGH 14, JOHN DOE ENTITIES 1
AND 2,

Defendants.

Civil Action No. 2:18-cv-09228-CCC-JBC

Document Electronically Filed

**DECLARATION OF MARTIN R.
KAFAFIAN, ESQ.**

I, Martin R. Kafafian, Esq., of full age, hereby certify as follows:

1. I am an attorney at law of the State of New Jersey and associated with the law firm Beattie Padovano, LLC, attorneys for defendant Ramapo Hunt & Polo Club Association, Inc. (“Association”) in the above-captioned matter. I submit this Declaration in response to and in support of Defendants Township of Mahwah, Geraldine Entrup, and Thomas Mulvey’s Motion to Dismiss the Complaint.

2. Annexed hereto as Exhibit A is a true and accurate copy of an Event Post from the Ramapough Mountain Indians, Inc., Facebook page for a “1 Year Anniversary” event to be held on Split Rock Sweetwater Prayer Camp, which Post was captured on September 25, 2017.

3. Annexed hereto as Exhibit B is a true and accurate copy of the Schedule of District Use Regulations for the Township of Mahwah.

4. Annexed hereto as Exhibit C is a true and accurate copy of Answer filed by the Ramapough Mountain Indians, Inc., in the state-court action *Ramapo Hunt & Polo Club Association, Inc. v. Ramapough Mountain Indians, Inc., and the Township of Mahwah*, Docket No. BER-L-006409-17 .

I declare under penalty of perjury that the foregoing is true and correct.

Beattie Padovano, LLC
Counsel for Defendant
Ramapo Hunt & Polo Club
Association Inc.

Dated: September 21, 2018

s/ Martin R. Kafafian
Martin R. Kafafian, Esq.
50 Chestnut Ridge Road, Suite 208
Montvale, NJ 07645
Telephone: (201) 573-1810
Facsimile: (201) 573-9736
mrk@beattielaw.com